

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF WISCONSIN

UNITED STATES OF AMERICA,

Plaintiff,

v.

Case No. 25-CR-064

JOSE ANGEL HERNANDEZ-PINEDA,

Defendant.

**GOVERNMENT'S RESPONSE TO
MOTION TO SUPPRESS AND FOR AN EVIDENTIARY HEARING**

The United States of America, by its attorneys, Richard G. Frohling, Acting United States Attorney for the Eastern District of Wisconsin, and Timothy W. Funnell, Assistant United States Attorney, opposes the defendant's motion for suppression, but as stated during the status conference, agrees that an evidentiary hearing is needed, which is scheduled for June 10, 2025. At the conclusion of the evidentiary hearing, the government anticipates asking the Court for a briefing schedule to file a memorandum on the merits opposing suppression.

Respectfully submitted on June 4, 2025,

/s Timothy W. Funnell
TIMOTHY W. FUNNELL
Assistant U.S. Attorney
WI Bar No. 1022716
United States Attorney's Office
Eastern District of Wisconsin
Green Bay Division
205 Doty Street, Suite 301
Green Bay, WI 54301
Tim.Funnell@usdoj.gov